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BY ECF AND ELECTRONIC MAIL

Honorable Alison J. Nathan
United States District Judge
Southern District of New York
40 Foley Square, Room 2102
New York, New York 10007

**Re: *City of Almaty, Kazakhstan, et ano. v. Felix Sater, et al.*,
Case No. 19 Civ. 2645 (AJN) (KHP)**

Dear Judge Nathan:

We represent the City of Almaty, Kazakhstan and BTA Bank (the “Kazakh Entities”). We write to respectfully request that the Court accept for filing under seal the unredacted version of the Kazakh Entities’ first amended complaint.

In accordance with the Court’s Individual Practices ¶ 4, accompanying this cover letter is a version of the Kazakh Entities’ first amended complaint to remain under seal subject to the Court’s approval, a version of the first amended complaint with highlighting reflecting proposed redactions, and a partial loose-leaf set of solely those pages on which the Kazakh Entities seek to redact material. In accordance with the Court’s Individual Practices, the Kazakh Entities filed the proposed redacted version, as well as this letter-motion, on ECF.

The proposed redacted material comprises quotations from and descriptions of non-public documents and testimony designated confidential by various entities and individuals, including Ilyas Khrapunov, Triadou SPV S.A., Felix Sater, and banks and financial institutions. It includes non-public corporate and financial information that falls within the scope of the Court’s confidentiality orders granting sealing requests by the same parties and non-parties in the related action. [See, e.g., Case No. 15 Civ. 5345, ECF Nos. 994, 1017, 1018, 1082, 1121 & 1127.] Furthermore, the documents and testimony quoted and described in the proposed redacted material are not public and have not been relied on by any court in the exercise of judicial authority. Finally, the proposed redacted material consists of information covered by the Stipulated Protective Order in this case, which was so ordered by Magistrate Judge Katharine H. Parker on July 8, 2019, and provides for the sealing of such material in accordance with the Court’s rules. [ECF No. 51 at 5-6.]

For these reasons, the Kazakh Entities respectfully request that the Court accept for filing under seal the unredacted version of their first amended complaint.

BSF

Respectfully,

/s/ Craig Wenner

Craig Wenner

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Encl.